

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

UNOPPOSED MOTION FOR TIME TO RESPOND

NOW COMES, West Indies Petroleum Limited (“WIPL”), and files this motion for time for WIPL to file a response to the United States’ Motion for Substitution of Parties (Doc. 67) on or before August 25, 2023.¹ The undersigned conferred with counsel of record for the United States, who confirmed that the United States does not oppose the motion.

Respectfully Submitted,

Dated: August 16, 2023

By: /s/ Ryan C. Stutzman
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¹ In addition to the agreement of the United States and WIPL, counsel for WIPL asserts that the good cause under Fed. R. Civ. P. 6 is as follows: undersigned counsel had a medical procedure including general anesthesia on August 4, 2023. Undersigned counsel further became unexpectedly and completely engaged in an urgent matter on behalf of the United Steelworkers Union the week of August 7, 2023, including, but not limited to, defense of the Virgin Islands Government's motion for emergency injunctive relief against Bureau of Motor Vehicles workers and preparation for an expedited testimonial hearing on that motion August 10, 2023 (scheduled by Order of the Superior Court dated August 7, 2023). See Superior Court Case File No. SX-2023-mc-00041. Although the August 10, 2023, hearing was cancelled the afternoon before the hearing, the aforementioned emergency issues persisted through the afternoon of August 11, 2023.